



U.S. Department of Justice

United States Attorney
Southern District of New YorkThe Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

November 9, 2021

BY ECF

The Honorable Richard M. Berman
 United States District Judge
 Southern District of New York
 500 Pearl Street
 New York, NY 10007

MEMO ENDORSED

Re: United States v. Robert Hadden,
S1 20 Cr. 468 (RMB)

Dear Judge Berman:

The Government respectfully writes, with the consent of defense counsel, to propose a schedule for pretrial filings in the above-captioned case. As the Court is aware, trial in this case is currently scheduled to begin on March 21, 2022. The parties have conferred and would respectfully propose the following pretrial schedule, subject to any revisions by the Court:

Date	Event
Jan. 3, 2022	Government to provide expert notice to defendant
Jan. 17, 2022	Defendant to provide expert notice to Government
Jan. 31, 2022 Jan. 24, 2022	Government to provide notice pursuant to Fed. R. Evid. 404(b) to defendant
Feb. 7, 2022 Jan. 31, 2022	Motions <i>in limine</i> and motions regarding expert witnesses
Feb. 21, 2022	Joint proposed request to charge, voir dire and verdict sheet
Feb. 28, 2022 Feb. 14, 2022 at 12:00 noon	Responses to motions <i>in limine</i> and motions regarding expert witnesses
Mar. 16, 2022	Final pretrial conference <i>at 9:30 a.m.</i> RMB

The parties are still in discussions as to whether to request a jury questionnaire be administered, and regarding appropriate deadlines for the disclosure of victims' names, materials pursuant to the Jencks Act, 18 U.S.C. § 3500, exhibit lists, and witness lists. We will continue to work to try to reach agreement on these issues.

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney

by: /s/ Alexandra Rothman

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cc: Defense Counsel (By ECF)

SO ORDERED:

RICHARD M. BERMAN U.S.D.J.
